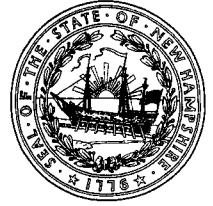




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

August 16, 2006

**LETTER OF DEFICIENCY #WSEB 06-082**  
Certified Mail #7000 1670 0001 2915 6366

Donald Ware  
Pittsfield Aqueduct Co.  
25 Manchester St.  
PO Box 1947  
Merrimack, NH 03054

Subject: Barnstead - Public Water System: Central Water Co. Inc./Sec S (EPA #0142020)

Dear Mr. Ware:

The records of the NH Department of Environmental Services ("DES") show that Central Water Co. Inc./Sec S is classified as a public water system ("PWS"), as defined by RSA 485:1-a. A PWS is defined as any water system supplying 15 or more services, or 25 or more people for 60 or more days per year. As such, the water system owner is required to submit samples according to the system's established Master Sampling Schedule to the State laboratory or a State-certified laboratory in compliance with NH Administrative Rules Env-Ws 320 through 330.

The enforceable maximum contaminant level ("MCL") for Arsenic is 0.010 mg/L. For systems on quarterly monitoring, compliance with the MCL is determined by the running annual average ("RAA"). The RAA is defined as the average of sample results collected over the last 12 month period. DES has determined that the most recent RAA for Source 001: BRW 1/40' NW of Locke Residence to be 0.019 mg/L. As such, Central Water Co. Inc./Sec S has exceeded the Arsenic MCL and violations of Env-Ws 326.10 have occurred.

DES records show that the subject water system exceeded the MCL for Arsenic for the first and second quarters of 2006 and as a result, two Notices of Violation ("NOV"s) were issued to the water system. Pursuant to Env-Ws 351, the NOV's noted the requirement that public notice of the Arsenic MCL violations be performed within 30 days and that proof of public notice be sent to DES within 10 days of performing such public notice.

To date, no proof of public notice has been received by DES for the second quarter 2006 Arsenic MCL violation, thus placing the water system in violation of Env-Ws 351.

DES acknowledges your efforts to resolve this issue in the most cost-effective manner as soon as possible, through your pilot testing program conducted the week of August 1, 2006. However,

due to the MCL and Public Notice violations incurred, we hereby request the following actions to return the system to compliance:

1. **As soon as possible**, but no later than **August 30, 2006**, carry out the public notice requirements for the second quarter 2006 Arsenic MCL violation in accordance with the instructions on the enclosed public notice template, and continue providing public notice **each calendar quarter** for as long as the violation occurs; and
2. **Within 10 days** of providing notice, submit proof of public notice to this office following the guidelines on the enclosed public notice handout; and
3. **By November 16, 2006**, submit to DES the Pilot Treatment Evaluation consultant's report, which shall contain the description of options evaluated, conceptual cost estimates, identification and justification of which option the owner has selected to implement, along with a timeline and final correction date to resolve the MCL violation(s). A maintenance schedule must be included if treatment is proposed. DES will approve the consultant's report, in writing, and specify the next submission deadline. A consultant's report determined to lack comprehensiveness will not be approved; and
4. **By the submission date established by DES** in the above-mentioned approval letter, submit to DES all engineering/technical documents for the design of the selected option. DES must review and approve, in writing, any engineering/technical documents prior to the commencement of any work on the system. Note that engineering plans for systems serving more than 50 service connections or 20,000 gpd must be stamped by a professional engineer; and
5. **By the DES-approved correction date**, take the corrective action as approved by DES. Notify DES in writing upon completion of the action(s) taken; and
6. Continue to sample in accordance with your Master Sampling Schedule, which includes quarterly sampling for Arsenic. A copy is enclosed.

In the event compliance is not achieved within this period, DES may initiate formal action against you, including issuing an order requiring the deficiencies to be corrected, initiating an administrative fine proceeding, and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

**All information as requested above should be addressed as follows  
or faxed to (603) 271-5171:**

Leah McKenna  
Department of Environmental Services  
Water Supply Engineering Bureau  
29 Hazen Drive, PO Box 95  
Concord, NH 03302-0095


It is important to also note that while a Radon standard has not yet been finalized, your historical level is 6,500 pCi/L. The most recent Federal standard proposed was 4,000 pCi/L if a Multimedia Mitigation Program (MMM) was in effect for that community. Without such an MMM program, the maximum acceptable Radon level in drinking water could not exceed 300 pCi/L.

Further review of your system's water quality indicates that your system has also had a history of Manganese detections above the secondary maximum contaminant levels (SMCL) established for these compounds. These are aesthetically based standards; as such compliance with the SMCL is required should consumer complaints arise.

For your information, fact sheets on Arsenic, Radon and Manganese are available at: <http://www.des.state.nh.us/ws.htm>. These include general information, health effects and removal options. Also enclosed is a summary of the expected content of consultant report submittals for your review. Please be reminded that proposed treatment alternatives should take into consideration all water quality parameters as well as current and future quantity needs.

In addition to your operator, assistance may be available to you through a variety of sources. DES staff member Cindy Klevens, P.E. may be able to answer questions concerning treatment for the aforementioned contaminant(s). She may be reached at (603) 271-3108 or via email at [cklevens@des.state.nh.us](mailto:cklevens@des.state.nh.us). Also, financial, managerial and technical assistance is available through either of two government funded technical assistance providers. These are Granite State Rural Water Association ((603) 753-4055) and RCAP Solutions, Inc. (1-800-488-1969). Health related questions may be directed to Dave Gordon of the DES Bureau of Environmental and Occupational Health whose number is (603) 271-4608. If you have any questions regarding this letter, please contact Leah McKenna, at (603) 271-0655 or by email at [lmckenna@des.state.nh.us](mailto:lmckenna@des.state.nh.us).

Sincerely,

  
Sarah Phillips, P.E., Administrator  
Water Supply Engineering Bureau

h:\wseb\enfm\enforce\lods\chem mon\2006\0142020 central water sec s mcl as lod 06-082.doc

Encl    Master Sampling Schedule  
         Public Notice Form  
         Report submittal information sheets

cc w/ encl(s): Christopher Countie, Primary Operator

cc:        Gretchen R. Hamel, DES Legal Unit Administrator  
            Thomas Normandin, Town of Barnstead Health Officer  
            ✓ EPA, Region 1  
            File

ec:        Cindy Klevens, P.E., DES  
            Dave Gordon, DES BEOH  
            Jack Shields, GSRWA  
            Robert Morancy, RCAP Solutions, Inc.